

EXHIBIT 111

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

STATES OF NEW YORK,
MASSACHUSETTS,
WASHINGTON, COLORADO,
CONNECTICUT, DELAWARE,
DISTRICT OF COLUMBIA,
HAWAII, ILLINOIS, IOWA, NEW
MEXICO, NORTH CAROLINA,
OREGON, PENNSYLVANIA,
RHODE ISLAND, VERMONT, and
VIRGINIA,

Plaintiffs,

v.

DONALD TRUMP, in his official
capacity as President of the United
States; U.S. DEPARTMENT OF
HOMELAND SECURITY; ELAINE
C. DUKE, in her official capacity; U.S.
CITIZENSHIP AND IMMIGRATION
SERVICES; U.S. IMMIGRATION
AND CUSTOMS ENFORCEMENT;
and the UNITED STATES OF
AMERICA,

Defendants.

CIVIL ACTION NO. 1:17-cv-05228
(NGG) (JO)

DECLARATION OF THOMAS G. AMBROSINO AND MARY M. BOURQUE

We, Thomas G. Ambrosino and Mary M. Bourque, declare as follows:

1. We collectively represent the city of Chelsea, Massachusetts, and the Chelsea Public Schools.

a. Thomas G. Ambrosino is the City Manager for Chelsea, which is a city of almost 40,000 residents located in Suffolk County. Chelsea is the smallest city in Massachusetts in land area, less than two square miles, and the twenty-sixth most densely populated incorporated place in the country.

b. Mary M. Bourque is the Superintendent of Schools for the Chelsea Public Schools, a gateway school system serving a diverse population of 6,338 students from prekindergarten through grade twelve and beyond.

2. One or both of us has personal knowledge of each of the matters set forth below.

3. Almost sixty-five percent of Chelsea's population is Latino, and forty-four percent of its population is foreign born, the largest foreign born population in Massachusetts.

4. Many DACA grantees and DACA-eligible individuals live in Chelsea, although the precise numbers are unknown.

5. Chelsea's DACA grantees are part of the fabric of our community. They include students, workers, sons and daughters, and parents. Many live in households with family members who depend on them, and some of these family members are American citizens.

6. The DACA program has made our city stronger, allowing residents to come out of the shadows and pursue educational and workforce opportunities that were previously unavailable to them. DACA has allowed Chelsea residents to access driver's licenses, home and

car loans, and to better support their families. Many of Chelsea's DACA grantees are tax payers, and all are consumers in our local economy.

7. DACA has had a positive impact on Chelsea's schools. With the promise of college and career, DACA has motivated more students to graduate and to achieve at higher levels. At least 20 DACA grantee graduates from the Chelsea High School class of 2017 are currently attending college, and a similar number of DACA grantees graduated and went on to college for the last few years.

8. Since the federal government's announcement that DACA will be terminated, many Chelsea residents and students are now frightened about their future and wary of going to school and work. This has already had a negative effect on the City's morale and economy and on the school environment.

9. If DACA is terminated, it will have a direct, adverse effect on the City of Chelsea and the Chelsea Public Schools.

10. The City has at least one young, talented employee working in its administration who is a DACA grantee. She is a rising star in the City's financial organization. If DACA is terminated and she loses her work authorization, it will adversely impact the City's operations and cost us time, money, and effort in replacing her and training her replacement.

11. The Chelsea Public Schools have at least one teacher who is a DACA grantee. If she loses her work authorization, the schools will lose a talented teacher in 2019, when her work authorization expires. It will cost us time and money to replace her and any other DACA grantee teachers and to train replacements.

12. The termination of DACA will also have an adverse impact on student achievement across the district. Students who do not see a future for themselves beyond high

school will not work hard and embrace education toward college and career. Other students who enjoy financial support from a family member's ability to work may have to drop out of school to support themselves financially.

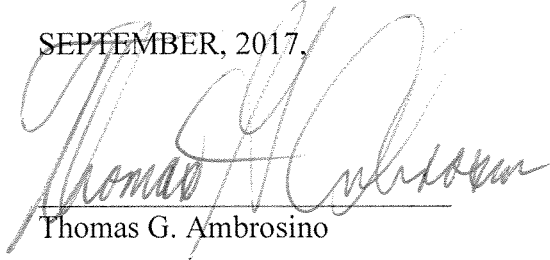
13. Lower academic achievement and a decrease in students completing high school will negatively impact our schools' and district's "accountability status," and could cause us to fall from a Level 3 to a Level 4 or 5 status. This decrease in status would require removal of administrators and teachers as well as increased funding streams from the Department of Elementary and Secondary Education to engage the schools in turnaround. It would also harm our community, as families are less likely to buy homes in lower-performing school districts.

14. As DACA grantee students experience greater anxiety about their futures, guidance counselors and other staff will need to spend more time with these students to help support them as they plan for an uncertain future.

15. DACA's termination will also threaten public safety and welfare. DACA grantees who fear that they could soon be deported are already losing trust in police and other local authorities. In turn, they are less likely to report violence, crime, abuse and other harms to the community.

16. Finally, the fear and lack of economic resources that will result from the termination of DACA will hurt our local economy. DACA allowed its grantees to spend more money in the local economy; these residents will now be more likely to stay home and cut their expenses. They will be more likely to fall into poverty, hurting the wellbeing and economy of Chelsea and its residents.

SIGNED UNDER THE PAINS AND PENALTIES OF PERJURY THIS 26th DAY OF
SEPTEMBER, 2017,



Thomas G. Ambrosino



Mary M. Bourque